

REMARKS

By this amendment, claims 21, 30, and 35 have been amended. Accordingly, claims 21-24, 30-33, and 35-37 are currently pending in the application, of which claims 21, 30, and 35 are independent claims.

Applicants respectfully submit that the above amendments do not add new matter to the application and are fully supported by the specification. Support for the amendments may be found at least in Figures 3, 4a, 4b, 5a-5d of the specification.

Entry of the present Amendment is respectfully requested. Accordingly, Applicant requests reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

Rejections Under 35 U.S.C. § 103

Claims 21-24, 30-33 and 35-37 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 6978264 issued to Chandrasekar, *et al.* ("Chandrasekar") in view of U.S. Patent No. 7,146,416 issued to Yoo, *et al.* ("Yoo"). Applicants respectfully traverse this rejection for at least the following reasons.

To establish an obviousness rejection under 35 U.S.C. § 103(a), four factual inquiries must be examined. The four factual inquiries include (a) determining the scope and contents of the prior art; (b) ascertaining the differences between the prior art and the claims in issue; (c) resolving the level of ordinary skill in the pertinent art; and (d) evaluating evidence of secondary consideration. *Graham v. John Deere*, 383 U.S. 1, 17-18 (1966).

In view of these four factors, the analysis supporting a rejection under 35 U.S.C. 103(a) should be made explicit, and should "identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements" in the manner claimed. *KSR Int'l. Co. v. Teleflex, Inc.*, 127 S. Ct. 1727, 82 USPQ2d 1385, 1396 (2007). The

Federal Circuit requires that "rejections on obviousness cannot be sustained with mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." *In re Kahn*, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006).

Finally, even if the prior art may be combined, there must be a reasonable expectation of success, and the reference or references, when combined, must disclose or suggest every claimed feature. *See in re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The Office Action relies on Chandrasekar to teach a search service system of claim 21 (see pages 3-6). In particular, the Office Action states Chandrasekar discloses "import the query logs in a database for determine the popularity of a key phrase, and match the query with the key phrases; the query log includes information on the number of query was entered" (see page 5). The Office Action also states that Chandrasekar does not teach "an input order computing unit for computing input order of keywords included in the first keyword group by using the second keyword group" (see page 6).

The Office Action fails to establish a *prima facie* case of obviousness of claim 21 at least because the combination of Chandrasekar and Yoo fails to disclose or suggest every claimed feature. As page 5 of the Office Action states, Chandrasekar discloses an "import the query logs in a database for determine the popularity of a key phrase, and match the query with the key phrases; the query log includes information on the number of query was entered."

However, this is not a feature of claim 21. Rather, claim 21 recites, *inter alia*:

a first search unit for searching the category classification database for a representative category associated with the first keyword group including the search keyword, the first search unit determining the second keyword group related to the first keyword group by referring to the category classification database, wherein the second keyword group including the first keyword group;
a second search unit for searching the keyword database for the second keyword group and data indicative of a number of searches made using one or more representative keywords or other keywords included in the second keyword group;

(emphasis added). Contrary to what the Office Action states, Chandrasekar does not disclose the feature of “a first search unit for searching the category classification database for a representative category associated with the first keyword group including the search keyword,” wherein “the first search unit determining the second keyword group related to the first keyword group by referring to the category classification database,” or wherein “a second search unit for searching the keyword database for the second keyword group and data indicative of a number of searches made using one or more representative keywords or other keywords included in the second keyword group.” Chandrasekar does not disclose a first search unit and a second search unit according to claim 1. Chandrasekar merely discloses a general method of searching and browsing on a single user query and a hierarchical structure of nodes. Further, Yoo fails to cure the deficiencies of Chandrasekar. Yoo discloses a web activity monitoring system that tracks categories and terms, but also fails to teach or suggest a first search unit and a second search unit according to claim 21. Chandrasekar and Yoo, either by themselves or in combination, fail to disclose claim 21 for at least these reasons. Since this is the case, a *prima facie* case of obviousness has not been established.

Claims 30 and 35 have been amended to include similar features of claim 21 noted above. Thus, Applicant respectfully submits that claims 30 and 35 are allowable over Chandrasekar and Yoo for at least similar reasons noted above with regard to claim 21.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. § 103(a) rejection of claims 21, 30, and 35. Claims 22-24 depend from claim 21, claims 31-33 depend from claim 30, and claims 36 and 37 depend from claim 35 and are allowable at least for this reason. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicant respectfully submits that independent claims 21, 30, and 35, and all the claims that depend therefrom, are allowable.

CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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